

## REMARKS

### I. Status Summary

Claims 1-40 are pending in the present application. Claims 1-13, 15-31, and 33-40 presently stand rejected, and claims 14 and 32 stand objected to. Claims 1, 21, and 34 have been amended. No new matter has been introduced by the present amendment. Reconsideration of the application as amended and based on the remarks set forth hereinbelow are respectfully requested.

The paragraph beginning at page 6, line 19, has been amended as set forth above to correct a typographical error. In particular, the term "anther" has been replaced with the term "another".

### II. Claim Rejection - 35 U.S.C. § 103

Claims 1, 2, 4, 11, 18, 19, 21, 22, 26, 34, and 40 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,625,273 to Ashdown et al. (hereinafter, "Ashdown") in view of the background of U.S. Patent Application Publication No. 2001/0053218 to Leung et al. (hereinafter, "Leung") and U.S. Patent Application Publication No. 2001/0046285 to Park (hereinafter, "Park"). Further, claims 3, 5, 25, 35, and 36 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ashdown, the background of Leung, and Park, and further in view of the invention of Leung. Claims 6, 23, and 27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ashdown, the background of Leung, and Park, and further in view of the background of Park. Further, claim 7 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Ashdown, the background of Leung, the background and

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invention of Park, and further in view of the invention of Leung. Claims 8-10, 12, 20, 24, 28, 29, 38, and 39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ashdown, the background of Leung, and Park, and further in view of Redmill, "An Introduction to SS7," Brooktrout Technology (July 2001) (hereinafter, "Redmill"). Further, claims 13 and 30 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ashdown, the background of Leung, and Park. Claims 15 and 33 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ashdown, the background of Leung, and Park, and further in view of U.S. Patent No. 6,249,572 to Brockman et al. (hereinafter, "Brockman"). Further, claims 16 and 31 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ashdown, the background of Leung, and Park, and further in view of the background of Ashdown. Claim 17 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Ashdown, the background of Leung, and Park, and further in view of Sprague. Claim 37 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Ashdown, the background of Leung, and Park, and further in view of the background of Park and the invention of Leung. These rejections are respectfully traversed.

#### II.A. Rejection of Claims 1, 2, 4, 11, 18, 19, 21, 22, 26, 34, and 40

Claim 1 recites a method for performing stateful signaling transactions in a distributed processing environment. Further, claim 1 recites receiving a first signaling message, and forwarding the first signaling message to a first stateful processing module of a plurality of stateful processing modules. For example, referring to Figure 3

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of the subject application, an STP **300** includes a plurality of stateful processing modules **310**, **312**, **314**, and **316**, which are physically connected to an IMT bus **302**. In one example, the stateful processing modules may be DSMs operable to perform message processing. A signaling message may be received by a LIM **306** and forwarded to one of stateful processing modules **310**, **312**, **314**, and **316** for processing.

Claim 1 also recites performing the following steps at the first stateful processing module: (1) generating a stateful transaction query message based on the first signaling message; (2) inserting an identifier in the stateful transaction query message for identifying the first stateful processing module; and (3) forwarding the stateful transaction query message to a destination. In one example, a signaling message may be an ISUP initial address message (IAM) that requires number portability processing (e.g., message Q1 shown in Figure 3) and may generate an associated TCAP number portability query message (e.g., message Q2 shown in Figure 3). (See e.g., page 18, line 25, to page 19, line 4, of the subject application). A trigger handler **712** may also insert into the TCAP query message an identifier associated with the stateful processing module that controls or initiates the stateful transaction. (See e.g., page 19, lines 7-9, of the subject application). The processing module identifier may be used to ensure that the TCAP response message is returned to the controlling stateful processing module from among the plurality of stateful processing modules.

Further, claim 1 recites receiving a response to the stateful transaction query message, where the response including the identifier. Claim 1 has been amended to recite using the identifier to distribute the response to the first stateful processing

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module that originated the stateful transaction query message from among the plurality of stateful processing modules and that the plurality of stateful processing modules are located in the same node. Thus, the identifier is used to distribute the response to the particular stateful processing module that originated the stateful transaction query message from among the plurality of stateful processing modules located in the same node.

Ashdown is directed to a system and method for caching local portability queries from a PSTN. The Examiner states that Ashdown does not teach elements (a), (b), (c), (d) and (e) of claim 1. Applicants agree. Ashdown discloses an intelligent communications platform (ICP) **202** deployed in-line between a service provider's SSP **220** and an SCP **222**. (See column 4, lines 59-62, of Ashdown). ICP **202** maintains access to both redundant SS7 linksets and maintains signaling state for the combined linkset. (See column 4, line 64, to column 5, line 1, of Ashdown). Further, ICP **202** combines all state monitoring, line control, and transaction state control for implementing access and service control functions. (See column 5, lines 47-49, of Ashdown). Ashdown fails to disclose or suggest elements (a), (b), (c), (d) and (e) of claim 1. In particular, Ashdown fails to disclose or suggest using an identifier to distribute a response to the first stateful processing module that originated a stateful transaction query message from among a plurality of stateful processing modules located in the same node.

Leung fails to overcome the significant shortcomings of Ashdown. The Examiner contends that the background of Leung discloses elements (a), (b), (c), (d) and (e) of

claim 1. Referring to paragraph 0004, Leung discloses TCAP for providing functions that control non-circuit-related information transfer between two or more signaling points (SPs). In particular, TCAP allows two SPs to establish a conversation where queries and responses are exchanged. (See paragraph 0004, of Leung). Unique transaction identifications (IDs) are assigned to different transactions for correlating answers with questions to which they are responsive. (See paragraph 0004, of Leung). In summary, Leung teaches using the transaction IDs for correlating answers with questions communicated between two SPs, rather than using an identifier to distribute a response to the first stateful processing module that originated a stateful transaction query message from among the plurality of stateful processing modules in the same node. In claim 1, the identifier functions distribute the response to the correct stateful processing module among a plurality of stateful processing modules in the same node. In contrast, Leung teaches correlating questions and answers between two nodes.

Park fails to overcome the significant shortcomings of Ashdown and Leung. Park is directed to a method of processing an intelligent network application protocol (INAP) for communication between an SSP of an intelligent network and a TCAP. Further, Park teaches stateful processing with respect to TCAP processing. (See paragraph 0012, of Park). However, Park fails to disclose or suggest the claim 1 feature of using an identifier to distribute a response to the first stateful processing module that originated a stateful transaction query message from among a plurality of stateful processing modules located in the same node.

For the reasons set forth above, applicants respectfully submit that Ashdown, Leung, and Park, alone or in combination, fail to disclose or suggest the claim 1 feature of using an identifier to distribute a response to the first stateful processing module that originated a stateful transaction query message from among a plurality of stateful processing modules located in the same node.

Further, the Examiner contends that it would have been obvious to a person of ordinary skill in the art to implement stateful information in a transaction query message based on motivation provided in Park. At page 7 of the Office Action, the Examiner contends that "[t]he motivation would have been that Park's method provides a concrete implementation of stateful information insertion to the TCAP messages, which makes the SS7 standard more robust in facing different state of transactions". Applicants respectfully disagree. At page 6 of the Office Action, the Examiner fails to sufficiently set forth a motivation for one of ordinary skill in the art to provide an identifier in a transaction query message for use in distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules, as recited by claim 1. The Supreme Court recently set forth in KSR International v. Teleflex, 550 U.S. \_\_\_\_ (2007), that for a court to determine whether a combination of elements is obvious is to ask whether the improvement is more than a predictable use or prior art elements according to their established functions (See KSR, 550 U.S. at 13). In further qualifying this test, the Court stated it is not enough to merely demonstrate that each of its elements was, independently, known in the prior art. (See KSR, 550 U.S. at 14). Applicants

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respectfully submit that nothing in Ashdown, Leung, Park, or the knowledge of one skilled in the art provides a motivation for using an identifier in a transaction query message to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules, especially where such stateful processing modules are located in the same node.

Further, the Court in KSR stated that it was improper for an obviousness inquiry to focus only on the stated problem that the patentee was trying to solve. Instead, the Court stated any need or problem known in the field of endeavor at the time of the invention and addressed by the patent can provide a reason for combining the elements. (See KSR, 550 U.S. at 16.) Thus, the Court indicates that a problem must be known in the field of endeavor and at the time of the invention to provide a reason for providing for combining elements in the manner claimed. The Examiner has provided no evidence that the problem of needing an identifier for distributing a response to the stateful processing module that originated a corresponding stateful transaction query message was known in the telecommunications art at the time the invention was made. With regard to the reasoning for combining Ashdown, Leung, and Park to implement stateful information in a transaction query message, the Examiner stated that "[t]he motivation would have been that Park's method provides a concrete implementation of stateful information insertion to the TCAP message". (See page 7 of Office Action.) However, the Examiner has not indicated that the problem of distributing a transaction query message to a stateful processing module that originated the corresponding query

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message was known in the art at the time the invention was made. The reasoning provided by the Examiner constitutes a "mere conclusory statement" (emphasis added) that is expressly prohibited as a reason to render an invention obvious. (See KSR, 555 U.S. at 14). Accordingly, for this additional reason, it is respectfully submitted that the rejection of claim 1 and its dependent claims 2, 4, 11, 18, and 19 under 35 U.S.C. § 103(a) as unpatentable over Ashdown in view of Leung and Park should be withdrawn.

Similar to claim 1, claim 21 recites the insertion of a stateful processing module identifier in a query message for distribution of a response to the stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Accordingly, for the reasons set forth above with respect to claim 1, it is respectfully submitted that the rejection of claim 21 and its dependent claims 22 and 26 under 35 U.S.C. § 103(a) as unpatentable over Ashdown in view of Leung and Park should be withdrawn.

Similar to claim 1, claim 34 recites inserting a stateful processing module identifier in the stateful query message, where the stateful processing module identifier identifies a stateful processing module that originates the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Accordingly, for the reasons set forth above with respect to claim 1, it is respectfully submitted that the rejection of claim 34 and its dependent claim 40 under 35 U.S.C. § 103(a) as unpatentable over Ashdown in view of the background of Leung, and Park should be withdrawn.



II.B. Rejection of Claims 3, 5, 25, 35, and 26

Claims 3 and 5 depend upon claim 1. Therefore, claims 3 and 5 include the features recited by claim 1. As stated above with respect to claim 1, Ashdown, the background of Leung, and Park, either alone or in combination, fail to disclose or suggest using the identifier to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. The description of the invention of Leung likewise lacks such teaching or suggestion. At paragraph 0034, Leung teaches forwarding a query to a signaling point (SP) that would better handle the query. There is no mention in Leung of using an identifier to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Accordingly, for this reason alone, the rejection of claims 3 and 5 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of the invention of Leung should be withdrawn and the claims allowed.

Further, for the reasons set forth above with respect to an obviousness inquiry, applicants respectfully submit that nothing in Ashdown, Leung, Park, or the knowledge of one skilled in the art provides a motivation for the claim 1 feature of using an identifier in a transaction query message to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Thus, for these additional reasons, the rejection of claims 3 and 5 under 35 U.S.C. § 103(a) as unpatentable over

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Ashdown, the background of Leung, and Park, and further in view of the invention of Leung should be withdrawn and the claims allowed.

Similar to claims 3 and 5, claim 21 recites the insertion of a stateful processing module identifier in a query message for distribution of a response to the stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Claim 25 depends upon claim 21. Accordingly, for the reasons set forth above with respect to claims 3 and 5, it is respectfully submitted that the rejection of claim 25 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of the invention of Leung should be withdrawn and the claim allowed.

Similar to claims 3 and 5, claim 34 recites inserting a stateful processing module identifier in the stateful query message, where the stateful processing module identifier identifies a stateful processing module that originates the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Claims 35 and 36 depend upon claim 34. Accordingly, for the reasons set forth above with respect to claims 3 and 5, it is respectfully submitted that the rejection of claims 35 and 36 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of the invention of Leung should be withdrawn and the claims allowed.

## II.C. Rejection of Claims 6, 23, and 27

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Claim 6 depends upon claim 1. Therefore, claim 6 includes the features recited by claim 1. As stated above with respect to claim 1, Ashdown, the background of Leung, and Park, either alone or in combination, fail to disclose or suggest using the identifier to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. The background of Park likewise lacks such teaching or suggestion. At paragraph 0005, the background of Park teaches an SP including an IP for receiving a request signal of specific information. There is no mention in the background of Park of using an identifier to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Accordingly, for this reason alone, the rejection of claim 6 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of the background of Park should be withdrawn and the claim allowed.

Further, for the reasons set forth above with respect to an obviousness inquiry, applicants respectfully submit that nothing in Ashdown, Leung, Park, or the knowledge of one skilled in the art provides a motivation for the claim 1 feature of using an identifier in a transaction query message to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Thus, for these additional reasons, the rejection of claim 6 under 35 U.S.C. § 103(a) as unpatentable over

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Ashdown, the background of Leung, and Park, and further in view of the background of Park should be withdrawn and the claim allowed.

Similar to claim 6, claim 21 recites the insertion of a stateful processing module identifier in a query message for distribution of a response to the stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Claims 23 and 27 depend upon claim 21. Accordingly, for the reasons set forth above with respect to claim 6, it is respectfully submitted that the rejection of claims 23 and 27 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of the background of Park should be withdrawn and the claims allowed.

#### II.D. Rejection of Claim 7

Claim 7 depends upon claim 1. Therefore, claim 7 includes the features recited by claim 1. As stated above with respect to claim 1, Ashdown, the background of Leung, and the background and invention of Park, either alone or in combination, fail to disclose or suggest using the identifier to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. The invention of Leung likewise lacks such teaching or suggestion. At paragraph 0034, the invention of Leung teaches that an application for transaction capability (TC) forwarding arises when an intermediate SP receives a query from another SP that it recognizes would be better handled by a third SP. There is no mention in the invention of Leung of using an

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identifier to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Accordingly, for this reason alone, the rejection of claim 6 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of the invention of Leung should be withdrawn and the claim allowed.

Further, for the reasons set forth above with respect to an obviousness inquiry, applicants respectfully submit that nothing in Ashdown, Leung, Park, or the knowledge of one skilled in the art provides a motivation for the claim 1 feature of using an identifier in a transaction query message to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Thus, for these additional reasons, the rejection of claim 7 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of the invention of Leung should be withdrawn and the claim allowed.

#### II.E. Rejection of Claims 8-10, 12, 20, 24, 28, 29, 38, and 39

Claims 8-10, 12, and 20 depend upon claim 1. Therefore, claims 8-10, 12, and 20 include the features recited by claim 1. As stated above with respect to claim 1, Ashdown, the background of Leung, and Park, either alone or in combination, fail to disclose or suggest using the identifier to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a

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plurality of stateful processing modules located in the same node. Redmill likewise lacks such teaching or suggestion. Redmill teaches various techniques for load sharing of SS7 messages among linksets. However, there is no mention in Redmill of using an identifier to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Accordingly, for this reason alone, the rejection of claims 8-10, 12, and 20 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of Redmill should be withdrawn and the claims allowed.

Further, for the reasons set forth above with respect to an obviousness inquiry, applicants respectfully submit that nothing in Ashdown, Leung, Park, or the knowledge of one skilled in the art provides a motivation for the claim 1 feature of using an identifier in a transaction query message to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Thus, for these additional reasons, the rejection of claims 8-10, 12, and 20 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of Redmill should be withdrawn and the claims allowed.

Similar to claims 8-10, 12, and 20, claim 21 recites the insertion of a stateful processing module identifier in a query message for distribution of a response to the stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Claims 24,

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28, and 29 depend upon claim 21. Accordingly, for the reasons set forth above with respect to claims 8-10, 12, and 20, it is respectfully submitted that the rejection of claims 24, 28, and 29 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of Redmill should be withdrawn and the claims allowed.

Similar to claims 8-10, 12, and 20, claim 34 recites inserting a stateful processing module identifier in the stateful query message, where the stateful processing module identifier identifies a stateful processing module that originates the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Claims 38 and 39 depend upon claim 34. Accordingly, for the reasons set forth above with respect to claims 8-10, 12, and 20, it is respectfully submitted that the rejection of claims 38 and 39 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of Redmill should be withdrawn and the claims allowed.

#### II.F. Rejection of Claims 13 and 30

Claim 13 depends upon claim 1. Therefore, claim 13 includes the features recited by claim 1. As stated above with respect to claim 1, Ashdown, the background of Leung, and Park, either alone or in combination, fail to disclose or suggest using the identifier to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Accordingly, for this reason alone, the rejection of

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claim 13 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park should be withdrawn and the claim allowed.

Further, for the reasons set forth above with respect to the rejection of claim 1, applicants respectfully submit that nothing in Ashdown, Leung, Park, or the knowledge of one skilled in the art provides a motivation for the claim 1 feature of using an identifier in a transaction query message to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Thus, for these additional reasons, the rejection of claim 13 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park should be withdrawn and the claims allowed.

Similar to claim 13, claim 30 recites the insertion of a stateful processing module identifier in a query message for distribution of a response to the stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Claim 30 depends upon claim 21. Accordingly, for the reasons set forth above with respect to claim 21, it is respectfully submitted that the rejection of claim 30 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of Redmill should be withdrawn and the claim allowed.

#### II.G. Rejection of Claims 15 and 33



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Claim 15 depends upon claim 1. Therefore, claim 15 includes the features recited by claim 1. As stated above with respect to claim 1, Ashdown, the background of Leung, and Park, either alone or in combination, fail to disclose or suggest using the identifier to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Brockman likewise lacks such teaching or suggestion. At column 2, lines 47-49, Brockman teaches using a TCAP message in an SS7 network to generate call detail records. However, there is no mention in Brockman of using an identifier to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Accordingly, for this reason alone, the rejection of claim 15 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of Brockman should be withdrawn and the claim allowed.

Further, for the reasons set forth above with respect to the rejection of claim 1, applicants respectfully submit that nothing in Ashdown, Leung, Park, or the knowledge of one skilled in the art provides a motivation for the claim 1 feature of using an identifier in a transaction query message to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Thus, for these additional reasons, the rejection of claim 15 under 35 U.S.C. § 103(a) as unpatentable over

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Ashdown, the background of Leung, and Park, and further in view of Brockman should be withdrawn and the claim allowed.

Similar to claim 15, claim 21 recites the insertion of a stateful processing module identifier in a query message for distribution of a response to the stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Claim 33 depends upon claim 21. Accordingly, for the reasons set forth above with respect to claim 15, it is respectfully submitted that the rejection of claim 33 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of Brockman should be withdrawn and the claim allowed.

II.H. Rejection of Claims 16 and 31

Claim 16 depends upon claim 1. Therefore, claim 16 includes the features recited by claim 1. As stated above with respect to claim 1, Ashdown, the background of Leung, and Park, either alone or in combination, fail to disclose or suggest using the identifier to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. The background of Ashdown likewise lacks such teaching or suggestion. The Examiner contends that the background of Ashdown teaches performing steps (a) – (e) as recited by claim 1 at an STP. Applicants respectfully disagree. Referring to column 2, lines 33-42 referenced by the Examiner, Ashdown mentions monitoring TCAP-related calls at an STP. There is no disclosure in the background of Ashdown of performing the steps recited by claim 1 at an STP. In particular, there is no mention in the background of Ashdown of using an identifier to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Accordingly, for this reason alone, the rejection of claim 16 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of Brockman should be withdrawn and the claim allowed.

Further, for the reasons set forth above with respect to an obviousness inquiry, applicants respectfully submit that nothing in Ashdown, Leung, Park, or the knowledge of one skilled in the art provides a motivation for the claim 1 feature of using an identifier in a transaction query message to distribute the response to the first stateful processing

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module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Thus, for these additional reasons, the rejection of claim 16 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of the background of Ashdown should be withdrawn and the claim allowed.

Similar to claim 16, claim 31 recites the insertion of a stateful processing module identifier in a query message for distribution of a response to the stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Claim 31 depends upon claim 21. Accordingly, for the reasons set forth above with respect to claim 16, it is respectfully submitted that the rejection of claim 31 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of the background of Ashdown should be withdrawn and the claim allowed.

#### II.I. Rejection of Claim 17

Claim 17 depends upon claim 1. Therefore, claim 17 includes the features recited by claim 1. As stated above with respect to claim 1, Ashdown, the background of Leung, and Park, either alone or in combination, fail to disclose or suggest using the identifier to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Sprague likewise lacks such teaching or suggestion. Referring to the abstract, Sprague teaches encapsulating a first SS7

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signaling point in a first IP packet, where the first IP packet is transmitted to a second SS7 signaling point over an IP network. There is no disclosure in the abstract of Sprague or anywhere else in Sprague of using an identifier to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Accordingly, for this reason alone, the rejection of claim 17 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of Brockman should be withdrawn and the claim allowed.

Further, for the reasons set forth above with respect to an obviousness inquiry, applicants respectfully submit that nothing in Ashdown, Leung, Park, or the knowledge of one skilled in the art provides a motivation for the claim 1 feature of using an identifier in a transaction query message to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Thus, for these additional reasons, the rejection of claim 17 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of Sprague should be withdrawn and the claim allowed.

#### II.J. Rejection of Claim 37

Claim 37 depend upon claim 34. Therefore, claim 37 includes the features recited by claim 34. As stated above with respect to claim 34, Ashdown, the background of Leung, and Park, either alone or in combination, fail to disclose or

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suggest using the identifier to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. As set forth above with respect to claims 3 and 5, the description of the invention of Leung likewise lacks such teaching or suggestion. There is no mention in Leung of using an identifier to distribute the response to the first stateful processing module that originated the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Accordingly, for this reason alone, the rejection of claim 37 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of the invention of Leung should be withdrawn and the claim allowed.

Further, for the reasons set forth above with respect to an obviousness inquiry, applicants respectfully submit that nothing in Ashdown, Leung, Park, or the knowledge of one skilled in the art provides a motivation for the claim 37 feature of inserting a stateful processing module identifier in the stateful query message, where the stateful processing module identifier identifies a stateful processing module that originates the stateful transaction query message from among a plurality of stateful processing modules located in the same node. Thus, for these additional reasons, the rejection of claim 37 under 35 U.S.C. § 103(a) as unpatentable over Ashdown, the background of Leung, and Park, and further in view of the invention of Leung should be withdrawn and the claim allowed.

### III. Allowable Subject Matter

Claims 14 and 32 stand objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Claims 14 and 32 have been amended to include the features of their respective base claims 1 and 21. Accordingly, applicants respectfully submit that claims 14 and 32 should be allowed.

### CONCLUSION

In light of the above Amendments and Remarks, it is respectfully submitted that the present application is now in proper condition for allowance, and an early notice to such effect is earnestly solicited.

If any small matter should remain outstanding after the Patent Examiner has had an opportunity to review the above Remarks, the Patent Examiner is respectfully requested to telephone the undersigned patent attorney in order to resolve these matters and avoid the issuance of another Official Action.

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DEPOSIT ACCOUNT

The Commissioner is hereby authorized to charge any fees associated with the filing of this correspondence to Deposit Account No. 50-0426.

Respectfully submitted,

JENKINS, WILSON, TAYLOR & HUNT, P.A.

Date: February 4, 2008

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